

EXHIBIT 2

Law Office of Robert T. Bean
3033 Brighton 3rd Street
Brooklyn, New York 11235
718-616-1414

Cell Phone: 484-838-9464
E-Mail: RBeanlaw@aol.com

Fax: 718-368-0981

Of Counsel for
Tanya Gendelman, P. C.

6-30-15

Carnell T. Foskey
Nassau County Attorney
Attn. Ralph Reissman
Deputy Nassau County Attorney
One West Street
Mineola, New York 11566

GOOD FAITH LETTER

Re: Weinstein v. Krumpter et al
Docket No.: CV 14-7210 (ADS) (AKT)

Dear Mr. Reissman,

Plaintiff served our Request for Production of documents on the Defendants on May 1, 2015 by e-mail and first class mail. Magistrate Tomlinson's Case Management and Scheduling Order (Doc. 21) dated April 27, 2015 sets a deadline for your response of June 26, 2015. To date we have received no such response. In accordance with Local Civil Rule 37.3, please call to confer on this matter to see if it can be resolved.

Also you will recall the deadline for our ESI and Confidentiality Agreement was May 29, 2015. I made numerous phone calls and e-mails to you in order to reach such an agreement. You promised to get back to me on this and have not done so.

This is to reiterate that the only ESI in possession of Plaintiff would be on his e-mail account, if any, and we agree to provide such on a flash drive, those e-mails relevant to his inability to participate in shooting matches and his inability to raise funds to obtain Sandy Relief due to the unconstitutional confiscation and retention of his property. Other than Plaintiff's medical records, which Magistrate Tomlinson has already ruled on, Plaintiff has no other confidentiality issues.

In our discovery request we have demanded information regarding all other confiscations of firearms meeting the *Razzano* criteria and have agreed to keep the identity of those citizens

involved confidential and will include such in our Confidentiality Agreement. Please call on my cell phone at 484-838-9464.

Sincerely,

/S/
Robert T. Bean